

EXHIBIT A

[Click here to Respond to Selected Documents](#)

Sort Date Entries: **Descending** Ascending

Display Options: All Entries 

08/31/2023

Corporation Served

Document ID - 23-SMCC-4888; Served To - CHAMBERLAIN UNIVERSITY; Server - ; Served Date - 11-AUG-23; Served Time - 08:00:00; Service Type - Sheriff Department; Reason Description - Served; Service Text - S.L. DESIGNEE

07/27/2023

Alias Summons Issued

Document ID: 23-SMCC-4888, for CHAMBERLAIN UNIVERSITY.

Alias Summons Requested

07/18/2023

Notice of Service

23-SMCC-3589.

Corporation Served

Document ID - 23-SMCC-3589; Served To - CHAMBERLAIN UNIVERSITY; Served Date - 07/17/2023; Served Time - 07:24:00; Service Type - SD; Reason Description - SERV; Service Text -

07/11/2023

Jury Trial Scheduled

Scheduled For: 12/04/2023; 9:00 AM; ELIZABETH BYRNE HOGAN; City of St. Louis

06/28/2023

Judge/Clerk - Note

Copy of petition for Carrie Sherman

Correspondence Filed

A LETTER MAILED TO PLAINTIFF WITH SERVICE SUMMONS AND PETITION TO SEND TO ST LOUIS COUNTY, MO
SHERIFF'S DEPARTMENT FOR SERVICE ON DEFENDANT

Summons Issued-Circuit

Document ID: 23-SMCC-3589, for CHAMBERLAIN UNIVERSITY.

06/27/2023

Ord Allow In Forma Pauperis

Filed By: TAMARA HAWKINS

Confid Filing Info Sheet Filed

Filed By: TAMARA HAWKINS

Petition Filed - No Fees

Filed By: TAMARA HAWKINS

Judge Assigned

Missouri Circuit Court
Twenty-Second Judicial Court
IN THE CIRCUIT COURT OF THE COUNTY OF ST. LOUIS
STATE OF MISSOURI

Tamara Hawkins,)
 Plaintiff,)
 v. 2322 MENARD STREET) Case No.: 2322-CC01286
 St. Louis, MO 63104) Division No.:
)

CHAMBERLAIN
 UNIVERSITY
 COLLEGE OF NURSING AND HEALTH
 SCIENCES, INC.,
 d/b/a CHAMBERLAIN UNIVERSITY,)
 Serve: CT Corporation System)
 120 South Central Ave.)
 Clayton, MO 63105)
)
)
)

Defendant.

Breach of Contract
PETITION

COMES NOW Plaintiff Tamara Hawkins and states:

The Parties

1. Plaintiff Tamara Hawkins is an individual.
2. Defendant Chamberlain University College of Nursing and Health Science, Inc., d/b/a Chamberlain University ("Chamberlain") is an Illinois for-profit corporation that is, and has been at all times relevant hereto, registered with the Missouri Secretary of State to do business in Missouri.

Factual Allegations Common to All Counts

3. At all times pertinent hereto, Plaintiff was enrolled in Chamberlain University, at its St. Louis County campus, as a student in its nursing program.
4. As part of the nursing program, in January 2018, Plaintiff took courses in Pharmacology (NR 293).
5. She received a failing grade for this course and had to retake the class.
6. However, she was advised to file appeals for exams and quizzes that she had missed during the semesters thereafter.

7. The plaintiff was not happy about how she had been treated by her professors during the semesters of 2018.

8. She was told by a fellow student to contact The State Board of Nursing to let them know what was

9. She then contacted her advisor in student services, to inform her about the treatment that she has been receiving and the possibility of her calling The State Board of Nursing.
10. The appeals that the plaintiff had filed were always be denied by the board of appeals, despite proof of extenuating circumstances.
11. The plaintiff did contact the President of the school about these denials and the President would reverse the boards decisions.
12. Suddenly, the plaintiff would be randomly administratively dropped from her classes on a regular basis and had to be manually placed back into her classes by her student advisor.
13. The plaintiff also received random emails sent by Chamberlain informing her of her academic withdrawal from her classes and/or nursing program, but none of this should have ever occurred.
14. Out of the thousands of students that attend this University, these things were only happening to the plaintiff.
15. During the stated occurrences, the plaintiff was frequently locked out of CANVAS, where students access their classes and communicate with the college staff, due to unjust manual administrative.
16. The plaintiff had no way of notifying Chamberlain staff members due to being locked out.
17. There were emails sent to her professors that they claimed were never received, but there is email confirmation that they received them.
18. The plaintiff knew that if she missed a class and/or would be late, that she must to file an appeal to receive full credit for assignments or exams, so she would email the President beforehand to let her know that she would be filing an appeal.
19. The plaintiff knew that the appeal would denied by board of appeals, so she wanted the schools President to look into the boards decision, knowing that it would be denied.

21. The plaintiff continued to reach out to the schools President and her advisor explaining how and why she felt that her education was at risk.
22. There was even a time when the plaintiff's final grade on her transcript was changed.
23. Chamberlain refused to provide the plaintiff with copies of the assignments, tests, quizzes, and exams that were administered from her previous and current classes.
24. For these reasons, Chamberlain University prevented the plaintiff from definitively determining whether she actually passed her courses.
25. On information and belief, an objective review of the plaintiff's performance on her tests and exams would reveal that she actually passed her courses and their reasoning behind the frequent grade changes would remain unanswered. Further, the plaintiff was told by her professor/s that something within the Chamberlain system had been acting differently and causing grades to be changed. The plaintiff was dropped from the nursing program on April 30, 2019, and she was no longer allowed to move forward in the defendant's nursing program.
26. The plaintiff received an email on October 7, 2019, which stated that Chamberlain University had started a re-entry program for students who had been academically dismissed from the program.
27. Once the plaintiff contacted her previous advisor at the college, she was told that she must file an appeal in order to be considered for re-entry into their nursing program.
28. The plaintiff did not file an appeal for re-entry into the program, because the same board of appeals members that never approved any of her appeals, would be the same board members that would make the decision on allowing the plaintiff re-entry into the program.
29. However, the email that was sent to the plaintiff and other students describing the necessary steps to take for re-entry into the nursing program. The instructions did not mention the need to file an appeal for re-entry.

program.

31. The plaintiff was the only student that was told to file an appeal in order to be considered for re-entry. Chamberlain has been accused previously, on many occasions, of denying African American students appeals more frequently than other racial group within their college.

32. As a direct and proximate result of Chamberlain's deception, fraud, false pretense, and conduct inconsistent with fundamental honesty, fair play principles and right dealings in public transactions, as well as the colleges consistent retaliatory and discriminatory efforts to remove her from the program, the plaintiff has been deprived of the value of the nursing college degree program that she enrolled in Chamberlain to pursue. The plaintiff was preyed upon, discriminated, and retaliated against, which ultimately led to the unjust dismissal from Chamberlain's nursing program on April 30, 2019.

33. Chamberlain's conduct as described herein was intentional and in violation of § 407.020, RSMo, otherwise referred to as the Missouri Merchandising Practices Act ("MMPA"), and the regulations of the Attorney General of Missouri promulgated thereunder, and in violation of § 287.780, RSMo, and in violation of § 213.067, RSMo, otherwise known as The Education and Title VI of the Civil Rights Act of 1964, and as a direct and proximate result of Chamberlain's illegal conduct, the plaintiff has suffered the ascertainable loss of money in the approximate amount of \$140,244.00.

34. The plaintiff has incurred and will incur court fees in prosecuting this action, for which Chamberlain is liable under § 407.025, RSMo, § 287.780, RSMo, and § 213.067, RSMo.

35. Chamberlain at all times acted intentionally, maliciously, willfully, outrageously, discriminately, and knowingly in violation of § 407.020, RSMo, § 287.780, RSMo, and § 213.067 RSMo, and is liable for lost pay, pain and suffering, and punitive damages in an amount of \$10,000,000.

WHEREFORE, Plaintiff Tamara Hawkins requests that this Court enter judgment in her favor and against Defendant Chamberlain University in an amount that is fair and reasonable in excess of \$25,000.00 together with costs of suit, pre and post-judgment interest, litigation expenses, and for such other and further

6/27/2023
Date

* Tamara Hawkins

By: Tamara Hawkins (Pro se)
2322 Menard Street
St. Louis, Missouri 63104
Telephone: (314) 203-22466

E-mail: tamarachawkins@hotmail.com

Sworn to and subscribed before me this 27th
date of June, 2023.

Witness my hand and official seal.

Notary Public Barbara D. Henfrow

BARBARA D. HENFROW
Notary Public - Notary Seal
State of Missouri
Commissioned for St. Louis City
My Commission Expires: May 31, 2024
Commission Number: 20606492

4970

Judge or Division:	Case Number: <u>2322-CC01286</u>
Petitioner: <u>TAMARA HAWKINS</u>	Petitioner's Address/Telephone: <u>2322 MENARD STREET</u> <u>ST. LOUIS MO 63104</u>
Respondent: <u>CHAMBERLAIN UNIVERSITY</u> <u>COLLEGE OF HEALTH SCIENCES</u>	Respondent's Address/Telephone: <u>120 SOUTH CENTRAL AVE</u> <u>CLAYTON, MO 63105</u>

(Date Filed Stamp)

Motion and Affidavit in Support of Request to Proceed As a Poor Person

Marital Status: <u>SINGLE</u>	If Married, Spouse's name:	Number of dependents: <u>3</u>
----------------------------------	----------------------------	-----------------------------------

(Include Spouse's Income and Expenses if Married)

Monthly Income

Gross salary (before deductions) \$

Public assistance \$

Retirement/Pension \$

Social Security \$

Child Support \$

Maintenance \$

Other income to be considered \$

Total Monthly Income

Monthly Expenses

☐ Mortgage ☒ Rent Payment

Utilities

Food

Payment on debts & credit cards

Child Support

Maintenance

Medical expenses to be considered

Total Monthly Expenses

Assets

Cash on Hand \$

Bank Accounts:

Checking \$

Savings \$

Approximate value of home \$

And/or other real estate \$

Approximate value of automobile(s) \$

(1) yr/make \$

(2) yr/make \$

Approximate value of personal

Possessions (list) \$

Total Assets \$

Debts

Home loan balance \$

Automobile loan(s) \$

Credit card balance(s) \$

Other debts to be considered \$

Total Debts \$

6/27/2023
Date

Camara Hawkins
Your Signature

Order to Proceed as a Poor Person

☒ The Court, having considered the Motion and Affidavit in Support of Request to Proceed as a Poor Person, finds that Petitioner is without sufficient funds or assets with which to pay the advance deposit for costs in this action and, therefore, is granted leave to proceed as a poor person and the required advanced deposit for costs is waived.

☐ The Court, having considered the Motion and Affidavit in Support of Request to Proceed as a Poor Person, finds that _____ has sufficient funds or assets with which to pay the advance deposit for costs in this action, and therefore, the Motion is denied.

6/27/23
Date

[Signature]
Commissioner/Judge



FILED AS A POOR PERSON

IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: ELIZABETH BYRNE HOGAN	Case Number: 2322-CC01286	
Plaintiff/Petitioner: TAMARA HAWKINS	Plaintiff's/Petitioner's Attorney/Address TAMARA HAWKINS 2322 MENARD STREET SAINT LOUIS, MO 63104-4219	
Defendant/Respondent: CHAMBERLAIN UNIVERSITY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	
Nature of Suit: CC Breach of Contract		(Date File Stamp)

Summons in Civil Case

The State of Missouri to: **CHAMBERLAIN UNIVERSITY**
Alias: **COLLEGE OF NURSING AND HEALTH SCIENCES INC**
DBA **CHAMBERLAIN UNIVERSITY**

CT CORPORATION SYSTEM
120 SOUTH CENTRAL AVENUE
CLAYTON, MO 63105

ST LOUIS COUNTY SHERIFF

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

June 28, 2023

Date

Thomas H. Hoysinger
Circuit Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above Summons by: (check one)

- ☐ delivering a copy of the summons and petition to the defendant/respondent.
- ☐ leaving a copy of the summons and petition at the dwelling house or usual place of abode of the defendant/respondent with _____, a person at least 18 years of age residing therein.
- ☐ (for service on a corporation) delivering a copy of the summons and petition to: _____ (name) _____ (title).
- ☐ other: _____

Served at _____ (address)
in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary \$ _____

Supplemental Surcharge \$ 10.00

Mileage \$ _____ (_____ miles @ \$._____ per mile)

Total \$ _____

A copy of the summons and petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



TWENTY-SECOND JUDICIAL CIRCUIT OF MISSOURI
CITY OF ST. LOUIS

THOMAS KLOEPPINGER
CIRCUIT CLERK

June 28, 2023

Cause Number: 2322-CC01286

Dear: TAMARA HAWKINS

Please find enclosed herein, two (2) copies of the summons with attached Petition in regard to the above cause number.

You must forward both copies to the **SAINT LOUIS COUNTY, MO SHERIFF'S DEPARTMENT** or other process server in the county and state where you are attempting to serve the defendants.

As the summons must be served within thirty (30) days of issue date, it is very important that you do this as soon as possible or the summons will expire.

Sincerely,

THOMAS KLOEPPINGER
Circuit Clerk


By: M MCMULLEN
Deputy Clerk

FAX

To: St. Louis City Circuit Court File Room

From: Carrie Sherman/Inter. Legal Pub

Fax: 314-613-7486

Pages: 1

Phone: 314-613-7192

Date: 6/28/2023

Subject: Civil Case Document Copies

Message:

Hello,

Please provide a copy of the Petition for the following cases. I do not need exhibits. When copies are ready for pick up, please contact me at **314-502-1599**.

Thank you,

Carrie Sherman

Case No. 2322-CC01286

Case No. 2322-CC01290

Case No. 2322-CC01283

Case No. 2322-CC01288

Case No. 2322-CC01289

Case No. 2322-CC01291

Case No. 2322-CC01284

Complete
6-28-23
MC



FILED AS A POOR PERSON

IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

7-28-23

Judge or Division: ELIZABETH BYRNE HOGAN	Case Number: 2322-CC01286
Plaintiff/Petitioner: TAMARA HAWKINS	Plaintiff's/Petitioner's Attorney/Address TAMARA HAWKINS 2322 MENARD STREET SAINT LOUIS, MO 63104-4219
Defendant/Respondent: CHAMBERLAIN UNIVERSITY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101
Nature of Suit: CC Breach of Contract	(Date File Stamp)

Summons in Civil Case

The State of Missouri to: CHAMBERLAIN UNIVERSITY
Alias: COLLEGE OF NURSING AND HEALTH SCIENCES INC
DBA CHAMBERLAIN UNIVERSITY

CT CORPORATION SYSTEM
120 SOUTH CENTRAL AVENUE
CLAYTON, MO 63105

ST LOUIS COUNTY SHERIFF

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

June 28, 2023

Date

Circuit Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above Summons by: (check one)

- ☐ delivering a copy of the summons and petition to the defendant/respondent.
☐ leaving a copy of the summons and petition at the dwelling house or usual place of abode of the defendant/respondent with a person at least 18 years of age residing therein.

☒ (for service on a corporation) delivering a copy of the summons and petition to: INTAKE SPECIALIST (title).

☐ other: _____

Served at CT CORP LCW - B. LOVE (address)
in ST. LOUIS (County/City of St. Louis), MO, on 7/17/23 (date) at 07:24 (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date):

(Seal)

My commission expires: _____ Date _____ Notary Public

Sheriff's Fees, if applicable

Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	\$ _____
Supplemental Surcharge	\$ 10.00
Mileage	\$ _____ (_____ miles @ \$ _____ per mile)
Total	\$ _____

A copy of the summons and petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

7-13-23

23-SMCC-5540

MISSOURI CIRCUIT COURT
TWENTY-SECOND JUDICIAL CIRCUIT
(CITY OF ST. LOUIS)

Tamara Hawkins
vs.
Chamberlain University

CASE NO. 2322-CCD1286 DIVISION 1

20

MEMORANDUM FOR CLERK

MOTION FOR ALIAS/PLURIES SUMMONS ORDERED TO ISSUE UPON

CDC-Lawyers Incorporating Service
SERVICE ADDRESS: 221 Bolivar Street
Jefferson City, MO 65101 Company

*****CHECK THE APPROPRIATE BOXES*****

DIRECT TO BE SERVED BY:

☒ SHERIFF OF Cole County MO

☐ MOTION FOR APPOINTMENT OF SPECIAL PROCESS SERVER

(NAME)

APPROVED

- ☐ SERVICE BY PUBLICATION ORDERED
☐ SERVICE BY MAIL ORDERED
☐ SERVICE BY POSTING AND MAIL ORDERED

RETURNABLE ON

- ☐ DATE CERTAIN
☐ THIRTY DAYS SUMMONS

REQUESTED BY:

Tamara Hawkins

SO ORDERED

JUDGE

**FILED AS A POOR PERSON****IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI**

Judge or Division: ELIZABETH BYRNE HOGAN	Case Number: 2322-CC01286	Special Process Server 1
Plaintiff/Petitioner: TAMARA HAWKINS	Plaintiff's/Petitioner's Attorney/Address TAMARA HAWKINS 2322 MENARD ST SAINT LOUIS, MO 63104-4219	Special Process Server 2
Defendant/Respondent: CHAMBERLAIN UNIVERSITY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	Special Process Server 3
Nature of Suit: CC Breach of Contract		(Date File Stamp)

ALIAS Summons in Civil Case

The State of Missouri to: **CHAMBERLAIN UNIVERSITY**
Alias: COLLEGE OF NURSING AND HEALTH SCIENCES INC
DBA CHAMBERLAIN UNIVERSITY

CSC -LAWYERS INCORPORATING SERVICE
 221 BOLIVAR STREET
 JEFFERSON CITY, MO 65101

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

July 27, 2023

Date

Circuit Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above Summons by: (check one)

- ☐ delivering a copy of the summons and petition to the defendant/respondent.
☐ leaving a copy of the summons and petition at the dwelling house or usual place of abode of the defendant/respondent with _____, a person at least 18 years of age residing therein.
☐ (for service on a corporation) delivering a copy of the summons and petition to: _____ (name) _____ (title).
☐ other: _____

Served at _____ (address)
 in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	
Supplemental Surcharge	\$ 10.00
Mileage	\$ _____ (_____ miles @ \$ _____ per mile)
Total	\$ _____

A copy of the summons and petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



Judge or Division: ELIZABETH BYRNE HOGAN	Case Number: 2322-CC01286	Special Process Server 1
Plaintiff/Petitioner: TAMARA HAWKINS	Plaintiff's/Petitioner's Attorney/Address TAMARA HAWKINS 2322 MENARD ST SAINT LOUIS, MO 63104-4219	Special Process Server 2 RECEIVED Special Process Server 3
Defendant/Respondent: CHAMBERLAIN UNIVERSITY	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	AUG 10 2023 COLE COUNTY SHERIFF'S OFFICE
Nature of Suit: CC Breach of Contract		

ALIAS Summons in Civil Case

The State of Missouri to: **CHAMBERLAIN UNIVERSITY**
 Alias: **COLLEGE OF NURSING AND HEALTH SCIENCES INC**
DBA CHAMBERLAIN UNIVERSITY
 CSC -LAWYERS INCORPORATING SERVICE
 221 BOLIVAR STREET
 JEFFERSON CITY, MO 65101

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

July 27, 2023

Date

Circuit Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above Summons by: (check one)

- ☐ delivering a copy of the summons and petition to the defendant/respondent.
☐ leaving a copy of the summons and petition at the dwelling house or usual place of abode of the defendant/respondent with _____, a person at least 18 years of age residing therein.

☒ (for service on a corporation) delivering a copy of the summons and petition to: CSC Lawyers Inc, S.C. (name) Designee (title).

☐ other: _____

Served at 350 E. High St (Lobby) (address)
 in Cole (County/City of St. Louis), MO, on 08-11-23 (date) at 0800 (time).

Sheriff John P. Wheeler
 Printed Name of Sheriff or Server

St. Auneau
 Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____
 Date Notary Public

Sheriff's Fees, if applicable

Summons \$ _____
 Non Est \$ _____
 Sheriff's Deputy Salary
 Supplemental Surcharge \$ 10.00
 Mileage \$ _____ (_____ miles @ \$_____ per mile)
 Total \$ _____

A copy of the summons and petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.